

DICKINSON WRIGHT PLLC
JOHN L. KRIEGER
Nevada Bar No. 6023
Email: jkrieger@dickinson-wright.com
STEVEN A. CALOJARO
Nevada Bar No. 12344
Email: scaloiaro@dickinson-wright.com
8363 West Sunset Road, Suite 200
Las Vegas, Nevada 89113-2210
Tel: (702) 550-4400
Fax: (844) 670-6009
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GLEN J. LERNER, an individual,

Plaintiff,

vs.

EXECUTIVE MARKETING
CONSULTANTS, INC., a California
corporation, ELLIS LAW CORPORATION,
a California corporation; DOES 1-50,
INCLUSIVE; and ROE CORPORATIONS
51-100,

Defendants.

CASE NO.: 2:18-cv-01481-JAD-CWH

**STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE RE
DEFENDANTS' MOTION TO DISMISS
(ECF NO. 6)**

(First Request)

Plaintiff GLEN J. LERNER ("Lerner"), Defendants EXECUTIVE MARKETING CONSULTANTS, INC., and ELLIS LAW CORPORATION ("EMC/ELC") through their undersigned counsel, hereby respectfully jointly submit this Stipulation and Order to Extend Briefing Schedule Re Defendants' Motion to Dismiss (ECF No. 6). Lerner recently retained the law firm of Dickinson Wright as counsel in this matter, and said counsel needs a brief extension of time to become familiar with the case such that a response can be prepared. So as to accommodate Lerner's new counsel and the intervening Thanksgiving holiday, the parties have agreed to the following schedule:

1. Lerner's opposition to the motion to dismiss, if any, will due on or by **Wednesday, November 21, 2018.**

2. EMC/ELC's reply in support of their motion to dismiss, if any, will be due on or by **Tuesday, December 4, 2018.**

This is the first stipulation for extension of time regarding briefing on the Motion to Dismiss to file, which is sought in good faith and not for the purpose of delay.

IT IS SO AGREED AND STIPULATED:

DATED this 5th day of November, 2018.

DICKINSON WRIGHT PLLC

HOWARD & HOWARD ATTORNEYS PLLC

By: /s/ John L. Krieger
John L. Krieger, Nevada Bar No. 6023
Steven A. Caloiaro, Nevada Bar No. 12344
8363 West Sunset Road, Suite 200
Las Vegas, Nevada 89113
Email: jkrieger@dickinson-wright.com
Email: scaloiaro@dickinson-wright.com

By: /s/ Jonathan W. Fountain
W. West Allen, NV Bar No. 5566
Jonathan W. Fountain, NV Bar No. 10351
3800 Howard Hughes Pkwy., Suite 1000
Las Vegas, NV 89169
Email: wwa@h2law.com
Email: jwf@h2law.com

Attorneys for Plaintiff Glen J. Lerner

John D. Denkenberger (*Pro Hac Vice*)
CHRISTENSEN O'CONNOR JOHNSON
KINDNESS PLLC
1201 Third Avenue, Suite 3600
Seattle, WA 98101

*Attorneys for Defendants Executive Marketing
Consultants, Inc. and Ellis Law Corporation*

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

Dated: November 6, 2018.